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NINETEENTH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

NUMBER: 499-737

DIVISION: D

J. ROBERT WOOLEY, AS
ACTING COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA
VERSUS
AMCARE HEALTH PLANS OF LOUISIANA, INC.

STATE
FILED

FILED: _____

DEPUTY CLERK

MOTION TO APPROVE FILING PROOFS OF CLAIM

NOW INTO COURT through undersigned counsel comes the Receiver for AmCare Health Plans of Louisiana, Inc. in Receivership (the "Receiver"), who represents that AmCare Health Plans of Louisiana, Inc. in Receivership ("AmCare") has certain claims against AmCare Management, Inc. ("AmCare Management") and AmCare Health Plans of Texas, Inc. ("AmCare Texas"), that both companies have been placed in receivership in the State of Texas pursuant to applicable Texas law in case number GV 204523 on the docket of the 200th District Court of Travis County, State of Texas, a copy of which order is attached hereto and incorporated herein and marked **Exhibit A**, that in said proceedings a stay order was entered and all claimants required to file with the Special Deputy Receiver for the two companies a proof of claim form as to any amounts owed by or due from AmCare Management and/or AmCare Texas. The Receiver seeks authority from the Court for the filing of the proofs of claims by AmCare with AmCare Management and AmCare Texas, and the pursuit of recovery through the proof of claim process approved by the Courts of the State of Texas overseeing the receivership of AmCare Management and AmCare Texas, and in particular certain claims for mismanagement, negligence, and other wrongful acts as to AmCare Management as asserted by the Receiver in case number 499-737-01, currently pending on the docket of this honorable Court, a copy of the petition filed is attached as **Exhibit B**, for the reasons more fully explained in the memorandum in support of this motion, which is attached hereto and incorporated herein.

WHEREFORE, the Receiver prays that the Court approve the filing of the proof of claim for AmCare Management, attached as **Exhibit C**, and the proof of claim for AmCare Texas, attached as **Exhibit D**, and pursuit of recovery through the proof of claim process approved by the Courts of the State of Texas overseeing the receiverships of AmCare Management and AmCare Texas, and

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that the Court approve the pursuit of certain claims for mismanagement and negligence against AmCare Management, in particular, through said process, and for all other appropriate relief.

RESPECTFULLY SUBMITTED,

BY ATTORNEYS FOR
J. Robert Wooley
Acting Commissioner of Insurance
for the State of Louisiana

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CERTIFIED TRUE COPY

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DEPT. OF REVENUE COURT

CLERK OF DISTRICT COURT
JEFFERSON PARISH, LA.
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Doug Welborn

CLERK OF DISTRICT COURT
JEFFERSON PARISH, LA.
DOUG WELBORN